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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian
business organization; and Murtuza Kazmi,

Defendants.

Civil Action No.: 3:23-cv-11808

**DECLARATION OF DAKOTA
SPEAS IN SUPPORT OF
DEFENDANTS’ MOTION FOR
SANCTIONS**

I, Dakota Speas, declare pursuant to 28 U.S.C. § 1746 that:

1. I am a member in good standing of the bar of the State of California and an associate at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I was admitted *pro hac vice* in this case on September 18, 2023 (ECF 39). I am one of the attorneys representing Defendants Traders Global Group Incorporated, a New Jersey corporation doing business as “My Forex Funds,” Traders Global Group Incorporated, a Canadian business organization, and Murtuza Kazmi (collectively, “Defendants”). I make this declaration upon facts known to me or upon information and belief, to the best of my knowledge.

2. Attached as **Exhibit 1** is a true and correct copy of the January 23, 2024 to February 29, 2024 email correspondence with the subject line “CFTC v. TGG” between Defendants’ counsel and counsel for Plaintiff Commodity Futures Trading Commission (“CFTC”).

3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the transcript from the November 6, 2023 Preliminary Injunction Hearing in this case.

4. Attached as **Exhibit 3** is a true and correct copy of the November 1, 2023 email correspondence with the subject line “CFTC v. Traders Global” between counsel for the Defendants and counsel for the CFTC.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the transcript from the November 2, 2023 deposition of defendant Murtuza Kazmi in this case.

6. I declare under the penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct and that I executed this declaration in Los Angeles, California on this 7th day of March, 2024.



Dakota Speas